

DAYLE ELIESON
United States Attorney
District of Nevada
TINA NAICKER, CSBN 252766
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 268-5611
Facsimile: (415) 744-0134
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA KEITH,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.)
Case No. 2:18-cv-01110-JAD-VCF
)
)
)
JOINT STIPULATION FOR EXTENSION OF
TIME AND ORDER
(First Request)
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 13, 2018 to **December 13, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel has been experiencing chronic migraines for over a week, which impairs her vision. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until late December. Counsel also has a Ninth Circuit brief due this week, which requires multiple levels of review. Due to Counsel's unanticipated leave and heavy workload, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's

1 Motion for Summary Judgment. Defendant makes this request in good faith with no intention to
2 unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
3 modified accordingly.

4

5 Respectfully submitted,

6 Dated: November 13, 2018

/s/ Cyrus Safa

(*as authorized by email on November 13, 2018)
7 CYRUS SAFA
8 Attorney for Plaintiff

9 DAYLE ELIESON
10 United States Attorney

11 /s/ Tina L. Naicker

12 TINA L. NAICKER
13 Special Assistant United States Attorney

14 **APPROVED AND SO ORDERED:**

15
16 November 13, 2018
17 DATED: _____

18
19
20
21
22
23
24
25
26 
THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the

JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER

on the date and via the method of service identified below:

CM/ECF:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
562-868-5886
Fax: 562-868-5491
Email: cyrus.safa@rohlfinglaw.com

Gerald Welt
Gerald M. Welt, Chtd.
703 S. 8th St.
Las Vegas, NV 89101
702-382-2030
Fax: 702-684-5157
Email: gmwesq@weltlaw.com

Attorneys for Plaintiff

Respectfully submitted this 13th day of November 2018,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney